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03/01/2021

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

MAR 01 2021

MAGISTRATE JUDGE
SUNIL R. HARJANI

UNITED STATES OF AMERICA

v.

CHRISTOPHER MOLINA,
also known as "AnomalyA"

Case No. **1:21-CR-00145**

Violations: Title 18, United States Code,
Sections 1028(a)(7) and 1029(a)(2)

JUDGE GETTLEMAN
MAGISTRATE JUDGE COLE
UNDER SEAL

COUNT ONE

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

From on or about September 7, 2015, through on or about September 7, 2016,
at Oakbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHRISTOPHER MOLINA,
also known as "AnomalyA,"

defendant herein, did knowingly and with intent to defraud, traffic in and use one or more unauthorized access devices, namely credit card account numbers issued in the names of various individuals, during a one-year period, and by such conduct obtained any things of value aggregating \$1,000 or more during that period, thereby affecting interstate commerce;

In violation of Title 18, United States Code, Section 1029(a)(2).

COUNT TWO

The SPECIAL NOVEMBER 2020 GRAND JURY charges:

On or about June 3, 2016, at Oakbrook, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHRISTOPHER MOLINA,
also known as "AnomalyA,"

defendant herein, did knowingly transfer in or affecting interstate commerce, without lawful authority, a means of identification of another person, namely, the name, social security number, date of birth, and credit card numbers of Individuals JB, MI, CL, LM, HM, TO, JS, and MT, knowing that the means of identification belonged to another actual person, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a felony violation of state law, namely, identity theft in violation of Illinois state law 720 ILCS 5/16-30(a)(1);

In violation of Title 18, United States Code, Sections 1028(a)(7) and (b)(2)(B).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2020 GRAND JURY alleges:

1. The allegations in Counts One and Two of this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 982, 1028(g), and 1029(c)(1)(C).

2. As a result of the violation of Title 18, United States Code, Sections 1028(a)(7), 1029(a)(2), as alleged in the Indictment,

CHRISTOPHER MOLINA,
also known as "AnomalyA,"

defendant herein, shall forfeit to the United States: (1) any and all right, title, and interest defendant may have in any property, real and personal, constituting and derived from, proceeds obtained directly and indirectly from the charged offenses, pursuant to Title 18, United States Code, Section 982(a)(2)(B); and (2) and any all right, title, and interest defendant may have in any property, used or intended to be used to commit the charged offenses, pursuant to Title 18, United States Code, Sections 1028(g) and 1029(c)(1)(C).

3. The interests of defendant subject to forfeiture pursuant to Title 18, United States Code, Sections 982, 1028(g), and 1029(c)(1)(C), include, but are not limited to:

- a. HP Pavilion P6000 computer, bearing serial number 4CE0321408;
- b. Toshiba Laptop, bearing serial number XB381444K;
- c. Samsung Galaxy Tablet, bearing serial number R52F912B8EJ;

d. Western Digital External Hard Drive, bearing serial number WXD1A34S4278;

e. Sandisk USB Drive, bearing serial number BM150124732V;

f. Kingston SD Card, bearing serial number WX8848P;

g. Kingston USB Drive, bearing serial number A0B097AD;

4. If any of the forfeitable property described above, as a result of any act or omission by defendant,

a. Cannot be located upon the exercise of due diligence;

b. Has been transferred or sold to, or deposited with, a third party;

c. Has been placed beyond the jurisdiction of the Court;

d. Has been substantially diminished in value; or

e. Has been commingled with other property with cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1), 1028(g), and 1029(c).

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B), 1028(g),
and 1029(c).

A TRUE BILL:

FOREPERSON

signed by Steven J. Dollear on behalf of the
UNITED STATES ATTORNEY